

EXHIBIT C

Aileen Gonzalez - 6/17/2025

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 4:24-CV-10017

AKARI JOHNSON, ET. AL,

Plaintiffs,

vs.

MMI 82, LLC, ET. AL,

Defendants.

Tuesday, June 17, 2025

11:05 a.m. - 3:59 p.m.

DEPOSITION OF AILEEN GONZALEZ

Taken before KHALED ELMOUSSA, Court Reporter, a
Notary Public for the State of Florida at Large,
pursuant to Notice of Taking Deposition filed in the
above-styled cause.

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1 media accounts?

2 A Same thing. Just take pictures of the hotel,
3 post them. The e-blast were a little bit different,
4 you had to create like, advertisements, I guess for the
5 hotel and then e-mail those out to everybody that we
6 had in our system.

7 Q How would you post pictures On your phone or
8 on the computer?

9 A On the phone.

10 Q But you had the -- you were logged into the
11 hotel's account because you had the credentials, right?

12 A Yes.

13 Q And they were saved in your phone?

14 A Yeah. I mean they were saved, yes, in the
15 phone.

16 Q Who else had credentials to the --

17 A Everybody did.

18 Q -- to the social media?

19 A Everybody did.

20 Q When you say everyone, you mean all the
21 employees?

22 A Any employee that wanted to post for Casa
23 Morada was given the credentials.

24 Q Okay. But which employees wanted to post and
25 were given credentials?

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1 A Usually the bartenders, Ellen bill, front
2 desk, sometimes breakfast would post.

3 Q How many followers did the -- strike that?
4 What's the handle on the IG account?

5 A I think it was Casa Morada Hotel.

6 Q How many followers did it have?

7 A I don't know. Honestly, I don't remember. It
8 wasn't more than like 5,000. It was definitely lower
9 than that.

10 Q Would you have discretion on which pictures
11 to post?

12 A No.

13 Q In other words, did you have to get approval
14 for each post you did?

15 A No. They knew like it could be something
16 inappropriate, you know.

17 Q People had to exercise, common sense.

18 A Right.

19 Q But for example, if you saw beautiful sunset.

20 A Um-hum.

21 Q And you took a photo, you'd be able to post
22 that --

23 A Correct.

24 Q -- without seeking approval for Mr. Cosa?

25 A Correct.

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1 Q Same for all the other employees?

2 A Yes.

3 Q Did Akari and Hazel have the credentials to
4 the social media account?

5 A Yes.

6 Q Was Akari authorized to use the laptop you
7 gave to Hazel to perform work from home?

8 A I don't know -- I don't know if he used it or
9 not.

10 Q Did Akari ever work on the hotel social media
11 accounts?

12 A Yes.

13 Q Okay. Was one of the reasons that Hazel got
14 the laptop to work on the hotel social media account?

15 A To do the e-blast.

16 Q What is an e-blast?

17 A An e-blast is just an advertisement you put
18 out. For example, if this weekend, you know, you're
19 going to drop the rates at the hotel, you do a little
20 advertisement, you send it out to everybody that we
21 already have in our system to try and get them to come
22 stay at the hotel that weekend to fill up the hotel.

23 Q Did Hazel have access to the system where you
24 could see who's receiving e-blast?

25 A Yes.

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1 Q December of 2023?

2 A Yes.

3 Q Did Hazel or Akari change it?

4 A I don't know.

5 Q Did you ever interface with Instagram to find
6 out who it was that changed the password or what phone
7 number was associated?

8 A Yes.

9 Q And what did you learn?

10 A That it was still connected to Stephanie
11 Ferrer's cell phone and e-mail address.

12 Q Okay. But more specifically, were you able
13 to understand who had changed the password in December
14 2023?

15 A No.

16 Q Were you able to unlock the account?

17 A No, I wasn't. I think that they ended up
18 unlocking the account, but I was not able to.

19 Q Did Instagram or any other social media
20 account restrict the hotel's profile because of any
21 posts that you made?

22 A No.

23 Q Did you ever post on the social media account
24 of the hotel about the conflict between Israel and
25 Palestine?

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1 A I don't see what that has to do with
2 anything, but no, I did not.

3 Q Did you ever share the login credentials with
4 anyone outside of the hotel's employees?

5 A No.

6 Q When Stephanie Ferrer left as the general
7 manager, were the credentials of the social media
8 accounts changed?

9 A Yes.

10 Q Because she left and she's not --

11 A Right. Correct.

12 Q So, what's the significance then of you
13 saying it was still connected to Stephanie's account
14 when --

15 A Because in order --

16 Q -- it was locked in December 2023?

17 A -- in order for us to get the, I guess,
18 backdoor information so that we could reset the
19 password, it was still for some reason connected to
20 stephanie@casamorada.com with her phone number. We
21 changed the credentials, we changed the login address,
22 the password, but that I guess original account that
23 created it was still the main contact.

24 Q In other words, she was like the backup or
25 the restoring contact --

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CERTIFICATE OF OATH

I, KHALED ELMOUSSA, Court Reporter, Notary Public,
State of Florida, certify that AILEEN GONZALEZ personally
appeared before me on the 17th day of June, 2025, and was
duly sworn

Signed this 24th day of June 2025.

Khaled Elmoussa

KHALED ELMOUSSA, Court Reporter
Notary Public, State of Florida
Commission No. HH 566837
Commission Expires: 6/30/28

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CERTIFICATE OF REPORTER

I, KHALED ELMOUSSA, Court Reporter, certify that I was authorized to and did report the Deposition of AILEEN GONZALEZ; that a review of the transcript was requested; and that the transcript is a true and correct record of my notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties, attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this 24th day of June 2025.

Khaled Elmoussa

KHALED ELMOUSSA, Court Reporter